

EXHIBIT

A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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PLAINTIFF'S REQUESTS FOR ADMISSIONS

Plaintiff American University of Antigua College of Medicine, through counsel, pursuant to Fed. R. Civ. P. 36 submits the following requests for admission. Your answer must admit the request, specifically deny the request, or make a statement that you cannot truthfully admit or deny the request. Fed. R. Civ. P. 36(a)(4). A denial must fairly respond to the substance of the matter. Fed. R. Civ. P. 36(a)(4). Pursuant to Fed. R. Civ. P. 36(a)(3) you have 30 days from the date of this request to respond.

REQUEST 1

Please admit that you are the owner and operator of aua-med.com

RESPONSE:

REQUEST 2

Please admit that you are the YouTube user auastudentrights.

RESPONSE:

REQUEST 3

Please admit that you are the owner of the YouTube channel auastudentrights.

RESPONSE:

REQUEST 4

Please admit that a purpose of aua-med.com is to deter potential students from enrolling at AUA.

RESPONSE:

REQUEST 5

Please admit that a purpose of the auastudentrights videos on YouTube is to deter potential students from enrolling at AUA.

RESPONSE:

REQUEST 6

Please admit that a purpose of the auastudentrights Channel on YouTube is to deter potential students from enrolling at AUA.

RESPONSE:

REQUEST 7

Please admit that on or before July 23, 2010 you republished aua-med.com without permission from the court.

RESPONSE:

REQUEST 8

Please admit that on or before July 23, 2010 you republished the videos by auastudentrights on YouTube and the associated channel without permission from the court.

RESPONSE:

REQUEST 9

Please admit that people have viewed the aua-med.com website and sent you that these viewers are not parties to the instant suit.

RESPONSE:

REQUEST 10

Please admit that people have viewed and commented on the auastudent rights videos and associated channel on YouTube and that these viewers are not parties to the instant suit.

RESPONSE:

REQUEST 11

Please admit that you published the following file: <http://www.aua-med.com/downloads/usmle-pass-rate.ppt>

RESPONSE:

REQUEST 12

Please admit that the <http://www.aua-med.com/downloads/usmle-pass-rate.ppt> document contains embedded student information including GPA and USMLE scores.

RESPONSE:

REQUEST 13

Please admit that the statements made on your website are intended to be factual.

RESPONSE:

REQUEST 14

Please admit that you published statements that AUA routinely commits fraud upon its students;

RESPONSE:

REQUEST 15

Please admit that you published statements that AUA falsifies its students' grades;

RESPONSE:

REQUEST 16

Please admit that you published statements that AUA breaches contracts

RESPONSE:

REQUEST 17

Please admit that you published statements that AUA disregards student civil rights;

RESPONSE:

REQUEST 18

Please admit that you published statements that AUA conspires against its students;

RESPONSE:

REQUEST 19

Please admit that you published statements that AUA engages in unethical practices;

RESPONSE:

REQUEST 20

Please admit that you published statements that AUA has “malicious intentions”

RESPONSE:

REQUEST 21

Please admit that you published statements that AUA administration and academic advisors are of a "heinous nature";

RESPONSE:

REQUEST 22

Please admit that you published statements that AUA students are sexually assaulted;

RESPONSE:

REQUEST 23

Please admit that you published statements that AUA professors teach students wrong information

RESPONSE:

REQUEST 24

Please admit that you published statements that AUA conspires to commit fraud and violations of civil rights;

RESPONSE:

REQUEST 25

Please admit that you published statements that AUA commits criminal activities reportable to the FBI.

RESPONSE:

REQUEST 26

Please admit that the only basis for your statement that AUA's alleged criminal activities are reportable to the FBI is your own report of these alleged activities to the FBI.

RESPONSE:

REQUEST 27

Please admit that you have no knowledge or information about other reports made about AUA to the FBI.

RESPONSE:

REQUEST 28

Please admit that you published statements that AUA's student pass rate for USMLE medical board exams is only 22.9%;

RESPONSE:

REQUEST 29

Please admit that you published statements that AUA contrives false evidence in student disciplinary proceedings;

RESPONSE:

REQUEST 30

Please admit that you published statements that AUA colluded with St. Joseph Hospital to maliciously end your career.

RESPONSE:

REQUEST 31

Please admit that you published statements that AUA's agents and employees engaged in a conspiracy.

RESPONSE:

REQUEST 32

Please admit that you published statements that AUA abused its power.

RESPONSE:

REQUEST 33

Please admit that you published statements that AUA committed perjury.

RESPONSE:

REQUEST 34

Please admit that you published statements that AUA is otherwise immoral and unethical.

RESPONSE:

REQUEST 35

Please admit that you published statements that AUA's agents are liars;

RESPONSE:

REQUEST 36

Please admit that you published statements that Antigua is full of "rape, murder, fraud, and government corruption" and that therefore AUA is an unsafe place.

RESPONSE:

REQUEST 37

If you admitted that you published any of the statements outlined in Requests 14 through 25 and 28 through 36, for each, please admit that you knew the statements were false when published.

REQUEST 38

If you admitted that you published any of the statements outlined in Requests 14 through 25 and 28 through 36, for each, please admit that you had no knowledge regarding the truth or falsity of the statement when you published it.

RESPONSE:

REQUEST 39

Please admit that you do not have and never had any license, approval or other form of consent from AUA to reproduce or otherwise utilize AUA's tradename, trademarks or logos on your websites.

RESPONSE:

/s/ Eric A. Buikema (P58379)
Eric A. Buikema (P58379)
Cardelli, Lanfear & Buikema, P.C.
322 West Lincoln Avenue
Royal Oak, Michigan 48067
(248) 544-1100
ebuikema@cardellilaw.com

Dated: November 8, 2010

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiff's Requests for Admissions, Plaintiff's Interrogatories to Defendant, Plaintiff's Requests for Production Pursuant to FRCP 34 and this Certificate of Service were served upon Steven L. Woodward, Defendant, via his email address Steve_L_woodward@yahoo.com and First Class U.S. mail to Steven Woodward, c/o 7211 Brittwood Lane, Flint, MI 48507 on November 8, 2010.

/s/ Eric A. Buikema
Cardelli, Lanfear, & Buikema, P.C.
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Royal Oak, MI 48067
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